

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 11 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Revision of Part 22 and Part 90 of the)
Commission's Rules To Facilitate Future)
Development of Paging Systems)

WT Docket No. 96-18

Implementation of Section 309(j) of the)
Communications Act -- Competitive Bidding)

PP Docket No. 93-253

To: The Commission)

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS

Submitted by:

**COALITION FOR A
COMPETITIVE PAGING INDUSTRY**

Jill Abeshouse Stern
Robert J. Cynkar
Janice H. Ziegler
Edmund D. Daniels

Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1128
(202) 663-8380

Its Attorneys

March 11, 1996

TABLE OF CONTENTS

	<u>Page</u>
I. SUMMARY OF COALITION'S POSITION	2
II. THE COMMENTS OF OTHER PARTIES UNANIMOUSLY OPPOSE THE FREEZE	6
A. The Comments Document the Devastating Impact Of The Freeze On The Paging Industry	6
B. The Comments Underscore The Arbitrary Nature Of The Freeze	8
C. The Comments Demonstrate The Impossibility Of Crafting A Freeze That Will Accommodate The Needs Of The Industry As A Whole	9
III. CONCLUSION	13

EXHIBITS:

- Exhibit A: Coalition's Membership
- Exhibit B: Business Wire Report (March 6, 1996) (with respect to
 impact of paging freeze on net sales of Glenayre Technologies, Inc.)

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REPLY COMMENTS

The Coalition for a Competitive Paging Industry ("Coalition"), by its attorneys, hereby submits reply comments with respect to the interim licensing rules adopted by Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceedings which impose a freeze on acceptance and processing of certain paging applications.¹ The Coalition represents paging carriers and paging equipment manufacturers, of varying sizes and geographical locations, who were prepared to move forward with major investments and/or transactions involving paging technology and facilities, bringing improved services to the public, when the freeze was imposed.²

¹ Notice of Proposed Rulemaking, WT Docket No. 96-18, PP Docket No. 93-253, FCC 96-52, released February 9, 1996.

² A partial listing of Coalition members is attached as Exhibit A.

I. SUMMARY OF COALITION'S POSITION

The Coalition filed an "Emergency Petition for Immediate Withdrawal of the Freeze" with the Commission on February 28, 1996 challenging the Commission's decision to halt acceptance and processing of paging applications pending the outcome of the underlying rulemaking proceeding. While recognizing that the Commission had established an expedited comment schedule with respect to the freeze, the Coalition's filing of the Emergency Petition was intended to underscore the devastating impact of the freeze upon the business of Coalition members and the urgency of their concerns. Each day in which the freeze continues means lost business opportunities in the marketplace for incumbent local and regional carriers (unlike their nationwide competitors who are exempted from the freeze); declining business values^{3/}; and inability to offer new, publicly beneficial paging services to customers, including expanded or improved coverage as well as advanced alphanumeric wireless messaging services.

The Coalition's opposition to the freeze rests primarily on the following concerns.

First, contrary to the Commission's expressed intention, the freeze is having a real, immediate and devastating impact on the ability of paging companies to meet customer demand in this highly competitive industry. This harm is caused by the industry's inability to file applications needed to make modifications to existing transmitters or to add additional sites except in severely

^{3/} As discussed below, one Coalition member, Glenayre Electronics, has announced that the freeze may result in a \$10 to \$12 million reduction in quarterly net sales. See Exhibit B. This announcement resulted in an immediate drop in the value of Glenayre's stock by 10 points. See Wall Street Journal, March 7, 1996, at C9.

limited (and often unclear) circumstances.⁴² The Coalition sought to illustrate this adverse impact through declarations of individual carriers attached to the petition. These representative examples include the following.

- Mountain Communications, Inc., a paging carrier on a shared PCP channel (152.48 MHz) in Mountain Home, Arkansas, a rural area near the Arkansas border, cannot meet strong local demand for voice paging service in this area because its application for five additional paging sites (outside its interference contour), was submitted to the industry frequency coordinator (NABER) prior to February 8, 1996, but was not coordinated when the freeze was imposed, and is therefore frozen under the Commission's interim licensing policy. A separate application for an available VHF common carrier channel in Mountain Home to relieve congestion on the company's existing system was being drafted when the freeze was imposed and is also barred under the terms of the freeze.
- Always Answering Service, a paging carrier licensed on 152.66 MHz (a VHF common carrier channel) and based in Hagerstown, Maryland, cannot proceed with plans to improve service to customers in the Haymarket, Virginia area along the Route 66 corridor, filling in a service gap in its wide-area system, because its application for a new site (filed December 20, 1995) was frozen and cannot be processed under the freeze because the 30-day cut-off period for competing applications had not expired by February 8, 1996 due to the Commission's budget and snow-related closures in the December-January time frame. Due to the location of the licensee's other transmitter sites, the Haymarket site could not be developed by anyone other than the incumbent licensee.
- Best Page, a paging licensee on 931.2125 MHz in Atlanta, Georgia, is suffering multiple harms from the freeze relating to the substantial investments it has made to develop a statewide paging system in Georgia which business activity is effectively halted and/or competitively harmed by the freeze (while its competitors -- including PageNet which has at least 5 nationwide channels in Atlanta -- are free to proceed). In southern Georgia,

⁴² Under the freeze, incumbent licensees can file for modifications and new sites within their "interference contour." The Coalition pointed out that the Commission apparently established a new, more restrictive definition of interference contour for freeze purposes in the NPRM (See NPRM at fn. 271). This new definition unilaterally reduces the protected service area of paging licensees substantially without comment by affected licensees, and the Commission should immediately clarify that the current definition of interference contour prevails during the rule-making. This is not to suggest, however, that the Coalition finds use of the interference contour (even as now defined under the rules) to be a proper measure of application acceptability, which it does not.

Best Page has 931 MHz common carrier applications which are frozen because they are mutually exclusive with another applicant even though the two applicants want to enter into a channel sharing agreement which allows both to offer wide-area service. Best Page also has pending applications for 38 sites along with a request for local exclusivity (in Georgia) on a 929 PCP channel which are frozen. It is possible that these PCP applications could be processed under the freeze; however, the exclusivity request will not be processed during the freeze. Without exclusivity, Best Page cannot be expected to make the major investments required to build the sites even if the underlying applications are granted.

The comments filed by other parties on March 1, 1996 detailed many other examples of the serious harm caused to incumbent licensees (and to related businesses such as resellers and equipment suppliers) by the freeze, and, ultimately, to the public they serve.

Second, there is no valid reason for imposing the freeze, and the Commission has failed to articulate a rationale for the freeze contrary to the requirements of the Administrative Procedure Act ("APA") and the Communications Act. The freeze is wholly unnecessary to meet the Commission's stated goals in the NPRM of transitioning to geographic licensing and using auctions for selecting among competing applications. The Commission itself has admitted that "white space" is virtually non-existent in this industry, and any white space that exists is likely (1) to be of use solely to incumbent licensees because of the interference protection criteria;⁵² and (2) to be found in smaller markets where there is little demand thereby eliminating any concerns about floods of speculative applications if the freeze were lifted.⁵³

⁵² Admittedly, it is possible that nationwide carriers could bid on geographic licenses in particular markets without any intention of building solely for the purpose of "containing" their local and regional competitors and thereby preventing further expansion by these competitors.

⁵³ The Commission concedes that the VHF and UHF Common Carrier Paging ("CCP") channels are heavily licensed, and that as a result "very little desirable spectrum . . . remains available for licensing on these channels." NPRM ¶ 13. Similarly, the Commission indicates that while more channels are available in the 931 MHz band context, even here "channels are scarce in virtually all major markets and most mid-sized markets." NPRM ¶ 14. Likewise, the Commission recognizes that in the Private Carrier Paging ("PCP") context, "soon there may be insufficient spectrum available to allow coordination of new systems (as opposed to "fill-in" sites) in most major or mid-

Footnote continued on next page

Although there is no evidence cited in the NPRM that auctionable white space exists, the Coalition pointed out that, even assuming arguendo that such white space exists, the Commission has failed to establish the requisite nexus between the freeze and the harm sought to be addressed.⁷² In other words, there is no evidence either that speculation or a flood of applications would occur or that this flood of speculative applications would compromise the goals of the rulemaking.⁸² To the contrary, the sole casualties of the freeze are legitimate paging businesses who are prevented from continuing their operations and meeting customer demand.

Third, the freeze discriminates between nationwide paging carriers and all other carriers -- including carriers like A+ Network who have developed a nationwide network through local and regional affiliates. As the Coalition made clear in its petition, in specific markets, customers do not differentiate between nationwide carriers and other carriers. All carriers are competing for the same traffic. Thus, the freeze provides a competitive advantage for one select group of paging operators without any reason to do so. Indeed, while the Coalition believes that the freeze should be lifted as to all carriers, if the Commission concludes otherwise, fairness requires that all carriers -- including nationwide licensees -- should be "frozen."

sized markets. . . . [S]ufficient spectrum. . . may not be available to allow licensing of any significant new systems on these frequencies." NPRM ¶ 18. All this suggests that there is, in reality, little "white space" that could be subject to auction even if the Commission adopted geographic licensing for these bands immediately.

⁷² See, e.g., *Arent v. Shalala*, 70 F.3d 610, 616 (D.C. Cir. 1995)(quoting *Motor Vehicle Manufacturers Ass'n v. State Farm Mutual Automobile Ins. Co.*, 463 U.S. 29, 43 (1983)).

⁸² As the Coalition pointed out, this is in contrast to the "steep rise" in demand for SMR channels noted by the Commission in imposing a freeze on SMR applications pending rulemaking. See *Licensing of General Category Frequencies in the 806-809.750/851-854.750 MHz Bands*, Order, DA 95-2119, ¶ 2 (rel. Oct. 4, 1995).

II. THE COMMENTS OF OTHER PARTIES UNANIMOUSLY OPPOSE THE FREEZE

On or before March 1, 1996, over 60 comments were filed on the freeze representing the views of more than 120 companies. Not one of the comments filed supports the freeze as formulated by the Commission in the NPRM. All of the parties oppose the freeze in its current form. In addition to being universally opposed to the freeze as implemented, the commenting parties each detail the harmful impact of the freeze on their daily operations, including their inability to obtain licenses necessary to compete and move forward with planned technological innovations and/or service upgrades. The comments thus provide additional support for the views expressed in the Emergency Petition and compel the Commission to immediately withdraw the freeze.

A. The Comments Document The Devastating Impact Of The Freeze On The Paging Industry

The comments filed by other parties underscore the devastating nature of the Commission's proposed freeze on incumbent licenses, particularly small and medium-sized businesses, and on the public in terms of reduced access to service improvements and emergency services. The comments illustrate the significant difficulties the freeze imposes on licensees' business plans and scheduled improvements of service.^{9/} Further, the comments echo our contentions that, when coupled with the competitive advantage given to the nationwide providers,

^{9/} Comments of Steven Seltzer, Personal Communications, Inc. at 3 (instead of anticipated "aggressive construction schedule," PCI is forced to cancel equipment orders to reduce hours and/or layoff employees); Comments of Personal Communications Industry Association at 14-16 (business plans and responsible improvements would be halted and operator's investments in identifying frequencies, designing system improvements, negotiating leases and ordering equipment would be lost); Comments of ProNet, Inc. at 6-7 (system upgrade to FLEX technology prevented and loss of potential business because of inability to meet customer demands); Comments of Jon Word, Pioneer Communications at 3 (by removing ability to respond to customer demands, freeze may cause complete loss of investment).

these harms will hit small and medium-sized business especially hard^{10/} contrary to national policy recently reaffirmed in the Telecommunications Act of 1996.^{11/} Additionally, the comments highlight the adverse impact of the freeze upon carriers' ability to provide necessary emergency service for medical and hospital users.^{12/}

Although the financial impact of the freeze -- resulting from lost business opportunity, inability to meet customer demand, and the like -- may be difficult to quantify, there is concrete evidence that the freeze is already devastating even the larger members of the paging industry. For example, Glenayre Technologies, Inc., a worldwide producer of telecommunications equipment, estimated that the paging freeze will result in \$10-12 million in lost sales for the first quarter of 1996 alone.^{13/} Glenayre may have to furlough 150-300 workers.^{14/} The market reacted to this news badly and Glenayre's stock plummeted 10 points -- a drop of nearly 25% -- in one day. *See* Wall Street Journal, March 7, 1996, at C9. This is just one concrete example of the adverse business impact caused by the Commission's sudden imposition of a freeze -- without the benefit of industry comment -- in the mistaken belief that it would have little effect on the industry.

^{10/} *See, e.g.,* Comments of the Paging Coalition on Interim Paging Licensing Procedures at 4 (impact would be most severe on small and medium sized paging providers who have yet to implement needed service expansions); Comments of Private Carrier Paging Licensees at 17 (freeze will produce market consolidation by impairing ability of smaller licensees to respond to marketplace for indefinite period of time).

^{11/} Pub. L. No. 104-104, § 257(a), 110 Stat. 56, 77 (signed Feb. 8, 1996).

^{12/} *See* Comments of Personal Communications Industry Association at 16 (freeze will cause significant delays in LifePage service used for vital-organ recipients); Comments of Paging Network, Inc. at 4 (freeze may impair service for new hospitals often built on periphery of established communities); Comments of Raymond C. Trott, P.E. at 4 ("freeze will impair ability to enhance coverage where new [medical] facilities are being constructed.").

^{13/} *See* Business Wire Report of March 6, 1996 (attached as Exhibit B).

^{14/} Comments of Glenayre Technologies, Inc. at 4.

B. The Comments Underscore The Arbitrary Nature Of The Freeze

The comments of other parties share the Coalition's view that there is virtually no white space available for auction in the paging service and, even assuming such white space, there is no showing that the freeze is necessary to preserve that white space. *See* Comments of B&B Communications, Inc. at 2 ("This is NOT a situation where large fields of fertile and untilled spectrum are available for new filers.") (emphasis in original); Comments of Glenayre Technologies, Inc. at 5 ("there is little if any 'white space' left on any paging frequencies"); Comments of Brandon Communications on Interim Licensing Proposal at 6 (there is very little "white space" left on the frequencies allocated to paging services and where "white space" remains, "there are few places that any party other than the incumbent paging operator on a particular frequency could locate a transmitter on that frequency consistent with the Commission's interference standards."); Comments of Jon Word, Pioneer Telephone Cooperative, Inc. at 8 ("The areas in the country in which unused paging spectrum is available are limited. . . Only in the most rural of states does any significant 'white space' exist on paging frequencies [a]nd this is simply because there is no existing demand for use of those channels in those areas."); Comment of Paging Partners at 3 (Because the paging industry is mature, "freezing these frequencies to assess their value as auction opportunities is equivalent to locking the barn several years after the horses have ridden off with their second or third owner.").

The comments thus confirm the Commission's own conclusion that limited "white space" remains, and that any "white space" available is, as one Commissioner has acknowledged, "unlikely to be of practical value to anyone other than the [incumbent]" and yet "may be of critical importance to the incumbent's ability to maintain its position in this highly competitive industry."

See Separate Statement of Commissioner Susan Ness appended to the NPRM. The comments also confirm that, if the Commission's (unexpressed) intention was to halt in advance a flood of speculative applications, even assuming speculation presents a problem, the Commission has the means to combat speculative applications without the comprehensive freeze it has adopted on incumbents. These techniques include strict enforcement of construction deadlines and prompt deletion of expired construction permits from Commission data bases.^{15/}

C. The Comments Demonstrate the Impossibility of Crafting a Freeze That Will Accommodate the Needs of The Industry As A Whole.

A review of the comments filed by other parties reveals that many parties have attempted to craft an exemption to the freeze that will meet their particular interests. Thus, exemptions have been suggested for PCP operators, shared channels, lower band common carriers, UHF/VHF control links, and so on. These attempts to define specific freeze exemptions are misguided, and serve to underscore the fundamentally unsound nature of any efforts to identify limited exemptions for incumbent licensees. Indeed, this plethora of suggested exemptions (generally benefiting only the commenting party) graphically illustrates why efforts to develop even-handed exemptions will ultimately fail and why the freeze must be lifted in its entirety.

The Coalition's petition and the comments of other parties reflect the unusually diverse nature of the **paging** industry, in terms of the number, size and types of carriers that have evolved. Moreover, the comments demonstrate the infinite variety of factual circumstances involved, which relate not only to differences between carriers, but to the filing posture of applications at the time the freeze was imposed. The comments include examples of applications filed with NABER but

^{15/} See, e.g., Comments of A+ Network on Interim Licensing Proposal at 5-6; Comments of Preferred Networks, Inc. at 9-10.

not forwarded to the FCC before the freeze, applications filed prior to the freeze but frozen because requisite notice periods had not expired when the freeze was imposed, pending exclusivity requests and other examples too numerous to mention. This diversity of factual circumstances makes it impossible to craft a general rule that will cover all situations, and argues against even attempting such a rule.

In this regard, it is not fruitful for the Commission to attempt to develop or refine exemptions to the freeze, particularly in cases where incumbent licensees seek to file applications for new or modified sites. At a minimum, the freeze on applications by incumbent licenses should be lifted immediately. Under the interim licensing rules, the Commission has proposed that incumbents will be permitted to file applications for new or modified sites within their interference contour. As discussed in the Emergency Petition and the comments of other parties, the Commission appears to have redefined the contour in a more restrictive fashion than previously applied under existing rules.^{16/} The comments object to the new definition of interference contour and urge the Commission to clarify its intentions in this regard.

While the Commission's unilateral redefinition of the interference contour in the NPRM is wrong, it bears emphasis that, even if this mistake were rectified, the basic approach (*i.e.*, of limiting applications by incumbent licensees pending the rulemaking outcome) is unacceptable for the reasons stated, including the lack of an overriding public interest reason (or even a factually valid reason) for the resulting industry harm and the discriminatory treatment between nationwide and other carriers.

^{16/} In its petition, the Coalition submitted a declaration by Kevin O'Brien of O'Brien Communications, Inc. which illustrates this disparity and demonstrates that the new definition could result in a reduction of the licensee's interference contour by 4,182 square miles or more depending upon the power and height of the facilities. See Emergency Petition at 8, n.5 and Exhibit 1.

Most importantly, as the Coalition urged in its Emergency Petition, incumbent licensees must have the flexibility to file for sites or modifications within their market areas but outside the interference contours of specific transmitter sites to meet customer demand and survive in a highly competitive industry. The ability to expand existing systems, in order to better serve the public and to provide wide area service, has been considered of paramount public interest importance by the Commission.^{17/} The Coalition's views were widely shared by other commenting parties who expressed strong concerns about the limits on the incumbents' ability to meet customer demand.^{18/}

The situation of Always Answering Service (*See* Exhibit 5 to the Emergency Petition) is illustrative. This paging company serves a wide area, ranging from Baltimore-Washington to Ocean City, and is seeking to add a site in Haymarket, Virginia in order to meet the needs of its subscribers by filling in a coverage gap along the Route 66 corridor. Although outside the interference contour of existing transmitters, this new site is needed to serve existing customers and to maintain the competitiveness of the company. This application does not preclude future geographic licensees because, while this application would expand the interference contour of Always Answering Services, any geographic licensee would be required to protect the incumbent operator and therefore would be unable to meet the interference protection standard (even as proposed in the NPRM) because of the proximity of the incumbent's other sites. Always Answering Service has sites in Manassas, Bailey's Crossroads, Winchester and Charlottesville.

^{17/} Amendment of the Commission's Rules to Provide Channel Exclusivity to Qualified Private Paging Systems at 929-930 MHz, *Report and Order*, 8 FCC Rcd 8318, 8330 at ¶ 33 (1993) ("allowing existing licensees to expand their service area will result in broader coverage for existing users of those systems, whereas authorizing a new competing system would prevent such users from obtaining expanded coverage without subscribing to both services.")

^{18/} *See, e.g.*, Comments of the Paging Coalition at 12-15; Pacific Bell Comments at 2-3.

The Haymarket site is outside the interference contours of these sites. However, no one else could put a transmitter in the Haymarket site and protect the other sites.

The Coalition further demonstrated in its Emergency Petition that the limitation on applications by incumbent licensees outside their interference contours prevents systems from implementing advanced wireless messaging (*i.e.*, alphanumeric) services through conversion to the new FLEX protocol, a high-speed synchronous data format, which dramatically increases the capacity of the paging channel through higher data rates. A FLEX network requires more transmitters to service the same area, frequently at perimeter locations outside of or at the edge of a licensee's interference contours.

The Coalition's opposition to limits on new or modified facilities by incumbents outside their interference contours also rests on the practical concern that it is impossible to define an exemption that fits all circumstances and can be administered by the Commission. Several comments attempt to develop tests such as 40 miles from existing transmitters, overlap of proposed and existing service contours by more than 50 percent, and "contiguous" to the incumbent's existing system. While these standards might be superficially appealing, the reality is that the Commission does not have the tools or resources -- whether software or personnel -- to review applications for compliance with a totally new standard and keep track of varying exemptions in different frequency bands. In addition, adoption of a new standard which has not been the subject of industry comment would be unlawful under the APA. Practically speaking, without industry comment, potential issues are unlikely to be raised. For example, the use of a 40 mile radius cannot be applied without regard to the specific parameters of a licensee's operations;

the standard will be more restrictive on some carriers in comparison to others depending upon the height and power of the transmitter involved.

III. CONCLUSION

For reasons fully set forth in the Coalition's Emergency Petition and supplemented herein, the paging freeze is arbitrary, capricious and an abuse of agency discretion. The comments of other parties with respect to the paging freeze are fully consistent with and offer additional support for the Emergency Petition. The Commission should therefore move forward expeditiously to enter an order granting the Coalition's petition and immediately withdrawing the freeze.

Respectfully submitted,

COALITION FOR A
COMPETITIVE PAGING INDUSTRY

By:



Jill Abeshouse Stern

Robert J. Cynkar

Janice H. Ziegler

Edmund D. Daniels

Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1128
(202) 663-8380

Its Attorneys

March 11, 1996

EXHIBIT A

COALITION FOR A COMPETITIVE PAGING INDUSTRY
Member Roster - March 7, 1996

A+ Network, Inc.	Pensacola, FL
A-I Paging, Inc.	Tullahoma, TN
Alger Communications, Inc.	Gradville, MI
Always Answering Service, Inc.	Hagerstown, MD
ASAP Paging	Hallettsville, TX
Awesome Paging	Victoria, TX
Beeper Express, Inc.	Orlando, FL
Best Page LLC	Atlanta, GA
BLC Communications	Flint, MI
Brandon Communications, Inc.	Brandon, MN
Cameron Communications, Inc.	Lake Charles, LA
Contact Communications	Minneapolis, MN
Delta Telepage	Greenville, MS
Dial-A-Beeper, Inc.	Brooklyn, NY
Digi Comm Communications	Palestine, TX
Electrocom Wireless, Inc.	Fairfield, NJ
Flagstaff Communications	Flagstaff, AZ
General Communciations & Electronics Corp.	Pine Brook, NJ
Glen Canyon Communications	Page, AZ
Glenayre Electronics, Inc.	Quincy, IL
Hallettsville Communications	Hallettsville, TX
Intermountain Wireless	South Weber, UT
Mountain Communications, Inc.	Mountain Home, AR
Mr. Radio	Bullhead City, AZ
Multicomm, Inc.	Hollidaysburg, PA
Page Communications, Inc.	New York, NY
Paging USA South, Inc.	Decatur, AL
Radio Communications of Virginia, Inc.	Richmond, VA
RAM Technology Communications, Inc.	Ashland, KY
RF Communications	Catawissa, PA
T.D. Miller, III, Mobile Communications, Inc.	Burlington, NC
Texas Association of Paging Services	Palestine, TX
TNT Communications	Fairmont, WV
Trinity International, Inc.	Corona, NY
Two-Way Radio Service, Inc.	Cumberland, MD

Contact:

Kevin F. O'Brien, President
O'Brien Communications, Inc.
5051 Rapidan Place
Annandale, VA 22003
Phone: (703) 354-5195 FAX: (703) 642-3478

EXHIBIT B

CHARLOTTE, N.C.--(BUSINESS WIRE)--March 5, 1996--Glenayre Technologies, Inc. (NASDAQ: GEMS) announced today that the recent Federal Communications Commission ("FCC") Notice of Proposed Rule Making ("NPRM"), which included a freeze on the acceptance of new applications for 900 MHz paging system licenses, will negatively impact the Company's 1996 first quarter net sales.

The Company indicated that the FCC action may result in a \$10 million to \$12 million reduction in net sales from analyst consensus estimates for the first quarter of 1996. The Company stated that the overall impact of the FCC action on 1996 annual net sales cannot presently be determined due to the uncertainty of final regulatory changes, including the duration of the licensing freeze.

The FCC accepted comments on the NPRM on March 1, 1996, with replies due by March 11, 1996. Final revisions to current regulations, if any, will be determined by the FCC sometime after the NPRM's final comment date of March 18, 1996.

Ramon Ardizzone, President and CEO, stated, "We are working independently and with the Personal Communications Industry Association (PCIA) and its members in their request to the FCC to immediately rescind the licensing freeze and to provide other clarifications of the FCC's actions taken on the 900 MHz paging channels, to prevent additional negative impact to the paging industry."

Glenayre Technologies is a worldwide provider of telecommunications equipment and related software used by leading wireless personal communications service providers. The Company specializes in paging, cellular, voice processing, mobile data and point-to-point wireless interconnection products and systems. The Company is included in the Nasdaq-100 Index(R).

CONTACT:

Glenayre Technologies, Inc., Charlotte

Stan Ciepcieliński, CFO, 704/553-0038

KEYWORD: NORTH CAROLINA

CERTIFICATE OF SERVICE

I, Felecia G. DeLoatch, hereby certify that the foregoing document was sent by first class mail, postage prepaid, or hand-delivered, on this 14th day of March 1996, to the following persons:

*Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

*Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

*Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

*Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

*Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

*Jackie Chorney
Legal Advisor to Chairman Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

*Lisa B. Smith
Legal Advisor to Commissioner Barrett
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

***Suzanne Toller**
Legal Advisor to Commissioner Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

***Rudolfo M. Baca**
Legal Advisor to Chairman Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

***Michele C. Farquhar, Chief**
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

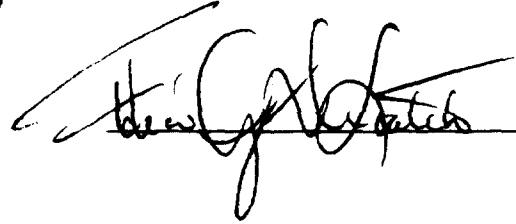
***David Furth, Deputy Chief**
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554

***William E. Kennard, Esq.**
General Counsel
Federal Communications Commission
1919 M Street, N.W., Room 614
Washington, D.C. 20554

***Mary P. McManus**
Legal Advisor to Commissioner Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

***David H. Solomon**
Deputy General Counsel
Federal Communications Commission
1919 M Street, N.W., Room 614
Washington, D.C. 20554

Mark Golden
Vice President
Industry Affairs
Personal Communications Industry Association
500 Montgomery Street, Suite 700
Alexandria, VA 22314

A handwritten signature in black ink, appearing to read "Mark Golden", written over a horizontal line.

*Hand Delivered

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